

[Submitting counsel on signature page]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IN RE: JUUL LABS, INC., MARKETING,
SALES PRACTICES, AND PRODUCTS
LIABILITY LITIGATION

This Document Relates to:

CLASS ACTIONS

Case No. 19-md-2913-WHO

**JOINT STIPULATION AND
~~[PROPOSED]~~ ORDER REGARDING
DEADLINE FOR SUBMITTING
PROPOSED REDACTIONS FOR CLASS
CERTIFICATION OPPOSITION
PAPERS**

Hon. William H. Orrick

**JOINT STIPULATION AND ~~[PROPOSED]~~ ORDER REGARDING DEADLINE FOR SUBMITTING
PROPOSED REDACTIONS FOR CLASS CERTIFICATION OPPOSITION PAPERS**

Case No. 19-md-2913-WHO

1 WHEREAS, on August 27, 2021, the Court granted (with modification) the parties'
 2 stipulation that, among other things, requested that materials related to Defendants' class
 3 certification oppositions be conditionally filed under seal. ECF 2306. The Court directed the
 4 parties to file proposed redactions within 20 days of filing Defendants' class certification
 5 oppositions;

6 WHEREAS the parties have been diligently reviewing the materials submitted in
 7 connection with Defendants' class certification oppositions and identifying materials they
 8 would request remain under seal;

9 WHEREAS JLI, Altria, and the Other Director Defendants each filed a brief and
 10 exhibits in opposition to class certification. Each opposition included as exhibits, among other
 11 things, deposition transcripts from plaintiffs in the litigation;

12 WHEREAS, given the volume of material submitted in opposition to class certification,
 13 Plaintiffs respectfully request, and Defendants do not oppose, a modest extension to the
 14 September 16 deadline for submitting a joint chart that identifies the materials that the parties
 15 wish to remain under seal.

16 **NOW THEREFORE**, the parties, through their undersigned counsel, hereby stipulate,
 17 agree and respectfully request that the Court enter an Order the parties shall file the joint chart
 18 identifying the materials that they request remain under seal no later than September 20, 2021.
 19 All other provisions of the Court's August 27 order remain in effect.

20
 21 Dated: September 16, 2021

Respectfully submitted,

22 By: /s/ Renee D. Smith

By: /s/ Sarah R. London

23 Renee D. Smith

Sarah R. London

24 James F. Hurst

**LIEFF CABRASER HEIMANN &
 BERNSTEIN**

KIRKLAND & ELLIS LLP

275 Battery Street, Fl. 29

300 N. LaSalle

San Francisco, CA 94111

Chicago, IL 60654

Telephone: (415) 956-1000

Telephone: (312) 862-2310

By: /s/ Peter A. Farrell

Peter A. Farrell
David M. Bernick
KIRKLAND & ELLIS LLP
1301 Pennsylvania Ave, N.W.
Washington, D.C. 20004
Telephone: (202) 389-5959

By: /s/ Dena C. Sharp

Dena C. Sharp
GIRARD SHARP LLP
601 California St., Suite 1400
San Francisco, CA 94108
Telephone: (415) 981-4800

By: /s/ Gregory P. Stone

Gregory P. Stone
Bethany W. Kristovich
MUNGER, TOLLES & OLSON LLP
350 South Grand Avenue, Fiftieth Floor
Los Angeles, California 90071-3426
Telephone: (213) 683-9100

By: /s/ Dean Kawamoto

Dean Kawamoto
KELLER ROHRBACK L.L.P.
1201 Third Ave., Ste. 3200
Seattle, WA 98101
Telephone: (206) 623-1900

Attorneys for Defendant Juul Labs, Inc.

By: /s/ John C. Massaro

John C. Massaro
Jason A. Ross
David E. Kouba
Paul W. Rodney
**ARNOLD & PORTER KAYE SCHOLER
LLP**
601 Massachusetts Ave., N.W.
Washington D.C. 20001
Telephone: (202) 942-5000

By: /s/ Ellen Relkin

Ellen Relkin
WEITZ & LUXENBERG
700 Broadway
New York, NY 10003
Telephone: (212) 558-5500

Co-Lead Counsel for Plaintiffs

*Attorneys for Defendants Altria Group, Inc.
and Philip Morris USA Inc.*

By: /s/ Eugene Illovsky

Eugene Illovsky
Martha Boersch
Matthew Dirkes
BOERSCH & ILLOVSKY LLP
1611 Telegraph Ave., Suite 806
Oakland, CA 94612
Telephone: (415) 500-6643

By: /s/ James N. Kramer

James N. Kramer
Roland Chang
**ORRICK HERRINGTON & SUTCLIFFE
LLP**
The Orrick Building
405 Howard Street
San Francisco, CA 94105-2669
Telephone: (415) 773-5700

Attorneys for Defendant Adam Bowen

Attorneys for Defendant James Monsees

By: /s/ Michael J. Guzman

Mark C. Hansen

Michael J. Guzman

David L. Schwartz

**KELLOGG, HANSEN, TODD, FIGEL &
FREDERICK, P.L.L.C.**

Sumner Square, 1615 M St., N.W., Suite 400

Washington, DC 20036

Telephone: (202) 326-7910

*Attorneys for Defendants Nicholas Pritzker,
Riaz Valani, and Hoyoung Huh*

FILER'S ATTESTATION

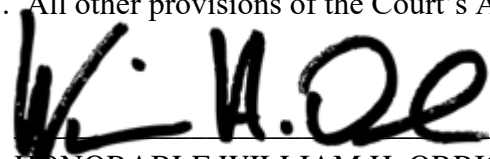
I, Dena C. Sharp, am the ECF User whose ID and password are being used to file this document. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that all counsel have concurred in this filing.

/s/ Dena C. Sharp

[PROPOSED] ORDER

PURSUANT TO STIPULATION AND GOOD CAUSE SHOWING, IT IS HEREBY ORDERED: the parties shall file the joint chart identifying the materials that they request remain under seal no later than September 20, 2021. All other provisions of the Court's August 27 order remain in effect.

Dated: September 16, 2021



HONORABLE WILLIAM H. ORRICK
United States District Judge